

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

CASE NO.: 0:22-CV-61842

DONALD J. TRUMP,

Plaintiff,

v.

CABLE NEWS NETWORK, INC.,

Defendant.

**JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO
COMPLAINT AND FOR BRIEFING SCHEDULE**

Defendant CABLE NEWS NETWORK, INC. (“CNN”), jointly with Plaintiff DONALD J. TRUMP (“Trump”), by and through their respective undersigned counsel, and pursuant to *Fed. R. Civ. P.* 6(b) and *S.D. Fla. L.R.* 7.1, respectfully move to establish a briefing schedule to address CNN’s anticipated motion to dismiss Plaintiff’s Complaint [D.E. 1] under *Fed. R. Civ. P.* 12(b)(6), and to extend the parties’ filing deadlines for same, stating as follows:

1. Trump filed his Complaint [D.E. 1] on October 3, 2022 and served CNN’s Registered Agent on October 11, 2022 [D.E. 10]. CNN currently has until November 1, 2022 to respond to the Complaint.

2. Given the nature of the Complaint, the claims made therein and CNN’s anticipated grounds for dismissal, CNN’s counsel raised the issue with Trump’s counsel of extending the briefing schedule for a response to the Complaint and stated that they also anticipated that Trump’s counsel would also seek leave to extend the deadline for filing his opposition to CNN’s anticipated

motion to dismiss from the 14 days provided for under the Local Rules for the Southern District of Florida.

3. The parties met and conferred and agreed that in the interest of judicial economy and professional courtesy as well as to reduce further extensions and motion practice, an extension of the schedule to respond to the Complaint would be appropriate in light of its scope and the need to fully address the issues raised therein. *See Compere v. Nusret Miami, LLC*, 2020 WL 2844888, *1 (S.D. Fla. May 7, 2020) (unopposed motion to extend the dispositive motion deadline by thirty days was granted by the Court).

4. Specifically, the parties agreed to the following schedule:

- a. Response to Complaint due: November 22, 2022
- b. Response to Rule 12 Motion due: December 30, 2022
- c. Reply to Rule 12 Motion due: January 18, 2022

5. This request for an extension of time is made timely, in good faith, for good cause and not for any improper purpose or undue delay. Neither party will be prejudiced by the Court extending their respective deadlines, as set forth above.

6. In accordance with S.D. Fla. L.R. 7.1.A.3, the undersigned certify that counsel for the parties have conferred regarding the relief requested herein, and both agree to and jointly move for the same.

WHEREFORE, Defendant CABLE NEWS NETWORK, INC., jointly with Plaintiff DONALD J. TRUMP, respectfully request that this Court enter an order granting their Joint Motion for Briefing Schedule by extending CNN's deadline in which to respond to the Complaint through and including November 22, 2022, Plaintiff's deadline in which to respond to CNN's anticipated Rule 12 motion through and including December 30, 2022, and CNN's deadline in which to file a

reply through and including January 18, 2022, and grant any additional relief as is just, equitable and proper.

Dated: October 21, 2022

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